

FENG LI. ESQ.
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PHONE:(973) 590-5110

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

STAR PACIFIC CORPORATION,
Plaintiff,

Case No.: CV 08-4957 (SDW)

-against-

STAR ATLANTIC CORPORATION, a
New Jersey Corporation, QI LU, individually
and as agent for Star Atlantic Corporation (NJ),
STAR ATLANTIC CORPORATION, a Florida
Corporation, YAFEI ZHAO a/k/a ALFRED
ZHAO, individually and as agent for Star
Atlantic Corporation (FL/NJ), OCEAN
TEXTILE CORPORATION, a Florida
Corporation, ANNA KARINA, INC., a Florida
Corporation, ZHENG LI a/k/a MICHAEL LI,
individually and as agent for Star Atlantic
Corporation (FL/NJ), Ocean Textile Corporation
and Anna Karina, Inc., JOHN DOE
1-10 and JANE DOE # 1-10, and XYZ
CORPORATION #1-10, all names being
fictitious and presently unknown,
Defendants.

**NOTICE OF MOTION TO WITHDRAW
AS OCEAN TEXTILE'S ATTORNEY**

PLEASE TAKE NOTICE that on September 7, 2009 at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorney for Defendants, Ocean Textile Corporation shall move before the Court at the United States District Courthouse in Newark, New Jersey, to withdraw as an attorney for the Ocean Textile Corporation.

PLEASE TAKE FURTHER NOTICE that in support of the instant motion, Defendants shall rely upon the Certification of Feng Li, Esq. filed and served simultaneously herewith.

PLEASE TAKE FURTHER NOTICE a Proposed form of order is being submitted simultaneously herewith.

Law Offices of Feng Li

Attorneys for Defendant, Ocean Textile Corporation

By: /Feng Li/

DATED: August 3, 2009

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**CERTIFICATION OF FENG LI FOR WITHDRAWING OF REPRESENTATION OF
OCEAN TEXTILE**

Feng Li, Esq., hereby certify and declare as follow:

1. I am an attorney who represents the Defendant, Ocean Textile in the above-captioned matter. I make this certification in support of my motion to withdraw the representation of Ocean Textile.
2. Since the representation of this matter, in every appearance in the Court, I was warned by Magistrate Judge Madeline Cox Arleo to be sanctioned.
3. For one instance, on June 16, 2009, there was a scheduled conference before Judge Arleo at 3:30 pm.
4. In the morning of June 16, 2009, I appeared before Honorable Dean Wilson in the State of New Jersey Superior Court.
5. The proceeding before Judge Wilson took longer than scheduled. I let my office informed Judge Arleo's Chamber for the possibility that I would be late for her conference.
6. Around 3:00 pm, Judge Arleo called Judge Wilson's chamber and shouted at me and told me if I was not in her chamber by 3:30 pm, I would be sanctioned.
7. I was driving under great stress to reach Newark from Morristown in 30 minutes. I run over red light and almost got involved an accident in order to get to Judge Arleo's chamber by 3:30 pm to avoid the sanction.
8. On July 22, 2009, Judge Arleo sanctioned me for a discovery dispute. In the Court, Judge Arleo claimed if this time she would not sanction me, she would sanction me next time.
9. In frond my client, the president of Ocean Textile, Judge Arleo criticized my representation as unprofessional.
10. It is clearly not in the best interest for Ocean Textile for me to continue to represent them due

to the fact that being constant threat of sanctions and sanction, I could not represent Ocean Textile effectively.

11. Ocean Textile also agreed to discharge me to represent them.

WHEREFORE, based upon all the foregoing, it is respectfully requested that the court grant my motion to withdraw the representation of Ocean Textile.

S:/Feng Li/
Feng Li, Esq.

Date: August 3, 2009

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ORDER

THIS MATTER having been opened to the Court upon the application of Feng Li, attorney for
Defendant, Ocean Textile for an order withdrawing the representation; and the Court having
considered the matter and for good cause shown;

IT IS this day of , 2009;

ORDERED:

1. Mr. Feng Li, Esq.'s motion to withdraw the representation of Ocean Textile is granted

HON. _____, U.S.D.J.